

Message

From: Cathy Laughner [cathyl@bkbh.com]
Sent: 4/15/2021 8:18:55 PM
To: Hanson, Robyn [Hanson.Robyn@epa.gov]; Garcia, Al [garcia.al@epa.gov]; Llamozas, Emilio [Llamozas.Emilio@epa.gov]
CC: Thomas Jodoin [TJODOIN@helenamt.gov]
Subject: Helena Final Draft Local Limits - 5 attachments
Attachments: 2019 Local Limits Re-evaluation.pdf; 6-11-2020 Local Limits Re-evaluation 2020 Update.pdf; Garcia 9/8/2020 and Culpo 10/19/2020 communications.; City of Helena EPA Region 8 Local Limits Development.final to EPA.xls; Data Analysis.2020 2021 DomCom to EPA.xlsx

All,

On 3/30/2021 I emailed Robyn the proposed final local limits spreadsheets which incorporate the recent domestic and commercial sampling and the updates discussed below.

The City has been working on redlining a procedure under which to proceed by commenting on and redlining EPA's paragraph 112 of the proposed AOC.

These limits are:

Pollutant	Daily(mg/L)	Monthly Limit(mg/L)
Arsenic	0.35	0.35
Cadmium	0.89	0.30
Chromium	3.62	3.62
Chromium (III)	3.04	3.37
Chromium (VI)	1.48	0.96
Copper	4.71	0.027 lb/day
Lead	4.71	1.22
Mercury	0.039	0.22
Molybdenum	3.93	3.16
Nickel	4.71	3.02
Selenium	2.90	0.46
Silver	1.47	7.46
Zinc	0.33	0.33

For EPA's convenience and request, attached to today's email are:

- (1,2) The two spreadsheets mentioned above.
- (3) Garcia's 9/8/2020 and Culpo's 10/19/2020 communications.
- (4) The 23-page June 11, 2020 proposed draft local limits update.
- (5) The Jan 2019 Local Limit Re-evaluation.

Robyn's 4/1 and two 4/7/2021 emails refer to a "September 2, 2020 Addendum" and some history. There is no "September 2, 2020 Addendum." On September 2, the City resent to Al the Jan. 2019 re-eval of local limits and the June 11, 2020 23-page Local Limits Re-Evaluation Update. Following receipt of Al's 9/8/2020 comments, on 10/23/2020 the City submitted a sampling plan for the two additional data points (which Al approved on 11/4/2020). I hope the 9/8/2020 and 10/19/2020 communications included in today's email help you. I will send you more detail of my understanding of the history.

The City is available for a call either 4/27 from 11-1 or 4/29 from 3:30 to 5.

Catherine Laughner